EXHIBIT B

U.S. Patent No. US 10,565,888 v. Zepp Health

1. Claim Chart

[5.P] A system, comprising: This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Company provides a Zepp app, that comprises a feature of Zepp Coach, an AI-powered softwars a digital fitness coach and works along with the Amazfit smartwatches and wearable devices to create	
comprising: This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Company provides a Zepp app, that comprises a feature of Zepp Coach, an AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that comprises a feature of Zepp Coach, and AI-powered software of the company provides a Zepp app, that company provides a Zepp app, the	
training programs.	e personanzed
A Comprehensive Personal Sports and Health Companion The Zepp App is where users are able to manage their device's Al biological engines and the information they record, like step count taken and quality of sleep, as well as more quantitative 24/7 tracking of measures like a user's heart rate. With customizable watch faces. Bluetooth connectivi smart devices, and the app's ability to minutely track like routes via GPS, the Zepp App is a complete solustay fit and healthy.	k workout statistics
Source: https://www.zepp.com/technology	

Now imagine: what if your Amazfit watch was supercharged with even more personalization for you and your health goals? Enter Zepp Coach™, our new AI-powered software that acts as your digital fitness coach, and can create and modify personalized training programs. Zepp Coach™ leaves the question "What should I do today?" on the bench as you work towards your goals.

The Amazfit + Zepp Coach™ Tag Team

There's no need to perform any fitness tests or assessments before you begin using Zepp Coach™. Simply enter a few details like certain physical characteristics, exercise experience level, and weekly workout frequency, and a workout plan will be devised that's tailored to you.

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Zepp Coach™

The Zepp Coach™ is an Al-powered coaching algorithm that provides tailored guidance to help users train and recover more effectively.

It allows users to enter their physical characteristics, exercise experience level, and preferred amount of training days per week into the Zepp App, which then generates a personalized training plan. As the user progresses, the Zepp Coach™ monitors their fatigue level, fitness level, and training status, and suggests a reduction in training intensity or a rest day to help avoid overtraining and reduce the risk of injury or exhaustion.

Source: https://www.zepp.com/technology

Zepp Coach™

Zepp Coach™ harnesses the power of AI to generate workout plans that are personalized to the users fitness level, schedule and goals. As users

progress through their plan, Zepp Coach™ provides scientific guidance to help them manage their training intensity in order to reduce the risk of problems caused by potential overtraining.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[5.1] a score component configured to assign a score to at least one aspect of an actual action of a user, where the at least one aspect comprises a physical range motion of during at least part of the actual action of the user such that the

Company provides a score component configured to assign a score to at least one aspect of an actual action of a user, where the at least one aspect comprises a physical range of motion during at least part of the actual action of the user such that the score accounts for the physical range of motion.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Zepp Coach, when paired with an Amazfit wearable, uses the Training Impulse Metric score (or TRIMP score) ("score component") that further uses the continuous monitoring of heart rate and the duration of the training session ("actual action of the user") to generate a single number ("score") that represents the training stress for a given workout. Further, the heart rate corresponds to the speed of the user while doing workouts ("physical range of motion").

score accounts for the physical range of motion;

Instead of external stress measures, Zepp Coach™ uses internal metrics which are more comparable between individuals with different fitness levels. For instance, if an experienced runner and a novice runner both run for 10 minutes at a speed that causes each to reach their maximal heart rate, then the relative stress for each is the same even if their speeds differ.

This is why Zepp Coach™, when paired with an Amazfit wearable, uses the Training Impulse metric (or TRIMP score) to quantify your exercise stress.

The TRIMP score uses the continuous monitoring of your heart rate and the duration of the training session to generate a single number that represents the training stress for a given workout. Minutes of increased heart rate contribute to a higher TRIMP score versus minutes when your heart rate is lower. For instance, a shorter workout during which your heart rate is close to peak performance will elicit a similar TRIMP score as a longer workout during which your heart rate is in a lower zone.

By using TRIMP, Zepp Coach™ and Amazfit know your personal training stress and adjust your digital health and fitness ecosystem accordingly.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

ExerSense™

Amazfit devices with ExerSense™ are able to automatically detect a range of sports movement, and prompt the user to open the corresponsing

sports mode - for an efficient and intelligent way to get moving without needing to scroll through watch menus.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[5.2] a selection component configured to select a training plan

Company provides a selection component configured to select a training plan for the user that corresponds to the score that accounts for the physical range of motion, where the selection component selects the selected training plan from a training plan set comprising a first training plan and a second training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

for the user that corresponds to the score that accounts for physical the of range motion, where the selection component selects the selected training plan from a training plan set comprising a first training plan and a second training plan;

For example, the Zepp Coach customizes a training plan ("selected training plan") based on the workout records of the user ("physical range of motion"). Upon information and belief, the Zepp Coach comprises the selection component that selects the customized training plan from a training plan set comprising a first training plan and a second training plan.

Zepp Coach will customize a training plan based on your workout records and habits to help you make workout a habit. This plan improves your exercise capacity and cardiopulmonary function while preventing sports injuries.

Source: https://support.amazfit.com/en/faq/10765

Now imagine: what if your Amazfit watch was supercharged with even more personalization for you and your health goals? Enter Zepp Coach™, our new AI-powered software that acts as your digital fitness coach, and can create and modify personalized training programs. Zepp Coach™ leaves the question "What should I do today?" on the bench as you work towards your goals.

The Amazfit + Zepp Coach™ Tag Team

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Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Zepp Coach™

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progress through their plan, Zepp Coach™ provides scientific guidance to help them manage their training intensity in order to reduce the risk of problems caused by potential overtraining.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[5.3] an output component configured to cause the selected training plan to be presented to a user, by way of a display as recommended training plan;

Company provides an output component configured to cause the selected training plan to be presented to a user, by way of a display as a recommended training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Zepp Coach allows the user to start the customized/personalized training plan ("recommended training plan), displayed in the Zepp app ("output component configured to cause the selected training plan to be presented to a user, by way of a display").

1) Start a plan:

Open the Zepp app, go to the home page to find the Zepp Coach card, tap Customize Plan, fill in your workout condition in the past 1 to 2 months as guided, and select rest days and start date to start the plan.

2) View and implement a plan:

After you set a training plan in the Zepp app, daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

Source: https://support.amazfit.com/en/fag/10765

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[5.4] reception component configured to receive an indication, by way of the display, that the user desires for the selected training plan to be a current training plan for the user; and

Company provides a reception component configured to receive an indication, by way of the display, that the user desires for the selected training plan to be a current training plan for the user.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the user sets the customized training plan ("selected training plan) in the Zepp app. Therefore, upon information and belief, the application comprises a reception component configured to receive an indication in the form of setting of the training plan, that the user desires for the customized training plan to be a current training plan for the user.

1) Start a plan:

Open the Zepp app, go to the home page to find the Zepp Coach card, tap Customize Plan, fill in your workout condition in the past 1 to 2 months as guided, and select rest days and start date to start the plan.

2) View and implement a plan:

After you set a training plan in the Zepp app daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

Source: https://support.amazfit.com/en/faq/10765

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[5.5]an appointment component configured to appoint the selected training plan as the current training plan for the user in response the indication that the user desires for the selected training plan be the to current training plan,

Company provides an appointment component configured to appoint the selected training plan as the current training plan for the user in response to the indication that the user desires for the selected training plan to be the current training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, after the user sets the training plan in the Zepp app ("in response to the indication that the user desires for the selected training plan to be the current training plan"), the workout recommendations are synced to the device where the app is installed. Therefore, it would be apparent for a person having ordinary skills in the art that the application comprises an appointment component configured to appoint the customized training plan as the current training plan for the user.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

Source: https://support.amazfit.com/en/faq/10765

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

¹⁾ Start a plan:

Open the Zepp app, go to the home page to find the Zepp Coach card, tap Customize Plan, fill in your workout condition in the past 1 to 2 months as guided, and select rest days and start date to start the plan.

²⁾ View and implement a plan:

After you set a training plan in the Zepp app, daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

[5.6] where score the component, the selection component, the output component, the reception component, the appointment component, or a combination thereof implement, at least in part, by way of non-software.

Company provides a system where the score component, the selection component, the output component, the reception component, the appointment component, or a combination thereof implement, at least in part, by way of non-software.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the process of scoring, customizing or personalizing the training plan, displaying the customized training plan, and setting the training plan ("the score component, the selection component, the output component, the reception component, the appointment component, or a combination thereof"), is completed by using a biotracker sensor in the Amazfit wearable ("non-software"), that provides workout records to the Zepp Coach in the Zepp app.

Health-Centered

The Zepp OS works in tandem with the advanced

BioTracker[™] PPG optical sensor and the self-developed algorithms found in Amazfit devices, to provide personal health and fitness data monitoring.



Source: https://www.zepp.com/technology

Zepp Coach™

Zepp Coach™ harnesses the power of Al to generate workout plans that are personalized to the users fitness level, schedule and goals. As users

progress through their plan, Zepp Coach™ provides scientific guidance to help them manage their training intensity in order to reduce the risk of problems caused by potential overtraining.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[9] The system of claim 5, comprising: a disclosure component configured to cause disclosure of the score to the user.

Company provides the system of claim 5, comprising a disclosure component configured to cause disclosure of the score to the user.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Zepp Coach provides the Training Impulse Metric score (or TRIMP score) to the user that generates a single number ("score") that represents the training stress for a given workout. Therefore, upon information and belief, the Zepp Coach comprises a disclosure component configured to cause disclosure of the score to the user.

Instead of external stress measures, Zepp Coach™ uses internal metrics which are more comparable between individuals with different fitness levels. For instance, if an experienced runner and a novice runner both run for 10 minutes at a speed that causes each to reach their maximal heart rate, then the relative stress for each is the same even if their speeds differ.

This is why Zepp Coach™, when paired with an Amazfit wearable, uses the Training Impulse metric (or TRIMP score) to quantify your exercise stress.

The TRIMP score uses the continuous monitoring of your heart rate and the duration of the training session to generate a single number that represents the training stress for a given workout. Minutes of increased heart rate contribute to a higher TRIMP score versus minutes when your heart rate is lower. For instance, a shorter workout during which your heart rate is close to peak performance will elicit a similar TRIMP score as a longer workout during which your heart rate is in a lower zone.

By using TRIMP, Zepp Coach™ and Amazfit know your personal training stress and adjust your digital health and fitness ecosystem accordingly.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[10.1] The system of claim 5, comprising: an update component configured to prompt the user to submit feedback on the system,

Company provides the system of claim 5, comprising an update component configured to prompt the user to submit feedback on the system.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, after the customized training plan is set and synced to the Zepp app, the Zepp Coach monitors fatigue level, fitness level, and training status, to determine how the user's body responds ("submit feedback") to exercise. Using this data, it can automatically adjust ("update component") scheduled workout duration, frequency and intensity.

Once you get started on your plan, Zepp Coach[™] will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach[™] collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

2) View and implement a plan:

After you set a training plan in the Zepp app, daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

3) View data:

In the Zepp app, you can go to the home page to find the Zepp Coach card and view the statistics charts on the details page

4) Modify and terminate a plan:

You can perform a scientifically sound assessment of your workout level on the home page of the Zepp app. On the details page, tap the Settings button in the upper right corner to modify or terminate your plan.

Source: https://support.amazfit.com/en/faq/10765

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[10.2] where the system is embodied upon a personal electronic device, and

Company provides the system of claim 5, where the system is embodied upon a personal electronic device.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Zepp Coach receives the workout record data from biotracker sensor embedded in the Amazfit wearable ("personal electronic device") worn by the user.

Health-Centered

The Zepp OS works in tandem with the advanced

BioTracker™ PPG optical sensor and the self-developed algorithms found in Amazfit devices, to provide personal health and fitness data monitoring.



Source: https://www.zepp.com/technology

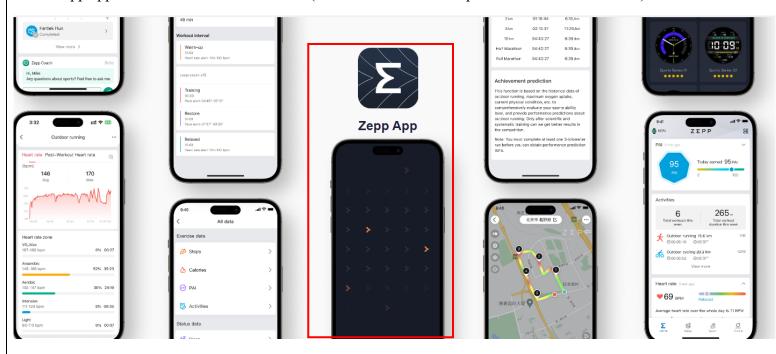
Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[10.3] where the feedback is communicate d to a location remote to the personal electronic device.

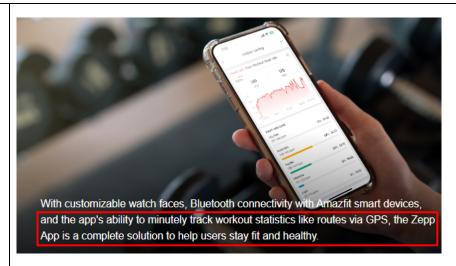
Company provides the system of claim 5, where the feedback is communicated to a location remote to the personal electronic device.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Amazfit wearable device communicates the health parameters such as fatigue level, and training status to the Zepp app installed in the mobile device ("location remote to the personal electronic device") of the user.



Source: https://www.zepp.com/technology



Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[11] The system of claim 10, where the feedback is based, at least in part, on an experience of the user with the appointed training plan.

Company provides the system of claim 10, where the feedback is based, at least in part, on an experience of the user with the appointed training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, after the customized training plan ("appointed training plan") is set and synced to the Zepp app, the Zepp Coach monitors fatigue level, fitness level, and training status, to determine how the user's body responds ("experience of the user with the appointed training plan") to exercise.

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company. Zepp Health ("Company") makes, uses, sells, and/or offers to sell a system. [17.P] system This element is infringed literally, or in the alternative, under the doctrine of equivalents. comprising: For example, Company provides a Zepp app, that comprises a feature of Zepp Coach, an AI-powered software, that acts as a digital fitness coach and works along with the Amazfit smartwatches and wearable devices to create personalized training programs. A Comprehensive **Personal Sports and Health Companion** The Zepp App is where users are able to manage their device's Al biological engines and the information they record, like step count taken and quality of sleep, as well as more With customizable watch faces, Bluetooth connectivity with Amazfit quantitative 24/7 tracking of measures like a user's heart rate. smart devices, and the app's ability to minutely track workout statistics like routes via GPS, the Zepp App is a complete solution to help users stay fit and healthy. Source: https://www.zepp.com/technology

Now imagine: what if your Amazfit watch was supercharged with even more personalization for you and your health goals? Enter Zepp Coach™, our new AI-powered software that acts as your digital fitness coach, and can create and modify personalized training programs. Zepp Coach™ leaves the question "What should I do today?" on the bench as you work towards your goals.

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Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

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Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[17.1] a score component configured to assign a score to at least one aspect of an actual action of a user, where the at least aspect comprises speed during at least part of the actual action of the user such that the score accounts for the speed;

Company provides a score component configured to assign a score to at least one aspect of an actual action of a user, where the at least one aspect comprises a speed during at least part of the actual action of the user such that the score accounts for the speed.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Zepp Coach, when paired with an Amazfit wearable, uses the Training Impulse Metric score (or TRIMP score) ("score component") that further uses the continuous monitoring of heart rate and the duration of the training session ("actual action of the user") to generate a single number ("score") that represents the training stress for a given workout. Further, the heart rate corresponds to the speed of the user while doing workouts.

Instead of external stress measures, Zepp Coach™ uses internal metrics which are more comparable between individuals with different fitness levels. For instance, if an experienced runner and a novice runner both run for 10 minutes at a speed that causes each to reach their maximal heart rate, then the relative stress for each is the same even if their speeds differ.

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The TRIMP score uses the continuous monitoring of your heart rate and the duration of the training session to generate a single number that represents the training stress for a given workout. Minutes of increased heart rate contribute to a higher TRIMP score versus minutes when your heart rate is lower. For instance, a shorter workout during which your heart rate is close to peak performance will elicit a similar TRIMP score as a longer workout during which your heart rate is in a lower zone.

By using TRIMP, Zepp Coach™ and Amazfit know your personal training stress and adjust your digital health and fitness ecosystem accordingly.

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ExerSense™

Amazfit devices with ExerSense™ are able to automatically detect a range of sports movement, and prompt the user to open the corresponsing sports mode - for an efficient and intelligent way to get moving without needing to scroll through watch menus.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[17.2] selection component configured to select a first training plan for the user that corresponds to the score that accounts for speed, the where the selection component selects the

Company provides a selection component configured to select a training plan for the user that corresponds to the score that accounts for the speed, where the selection component selects the selected training plan from a training plan set comprising a first training plan and a second training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Zepp Coach customizes a training plan ("selected training plan") based on the fitness parameters such as speed while doing workouts. Upon information and belief, the Zepp Coach comprises the selection component that selects the customized training plan from a training plan set comprising a first training plan and a second training plan.

Zepp Coach will customize a training plan based on your workout records and habits to help you make workout a habit. This plan improves your exercise capacity and cardiopulmonary function while preventing sports injuries.

Source: https://support.amazfit.com/en/faq/10765

selected
training plan
from a
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and a second
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Zepp Coach™

Zepp Coach™ harnesses the power of Al to generate workout plans that are personalized to the users fitness level, schedule and goals. As users

progress through their plan, Zepp Coach™ provides scientific guidance to help them manage their training intensity in order to reduce the risk of problems caused by potential overtraining.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[17.3] an output component configured to cause the selected training plan

Company provides an output component configured to cause the selected training plan to be presented to a user, by way of a display as a recommended training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

presented to a user, by way of a display as a recommended training plan;

For example, the Zepp Coach allows the user to start the customized/personalized training plan ("recommended training plan), displayed in the Zepp app ("output component configured to cause the selected training plan to be presented to a user, by way of a display").

Start a plar

Open the Zepp app, go to the home page to find the Zepp Coach card, tap Customize Plan, fill in your workout condition in the past 1 to 2 months as guided, and select rest days and start date to start the plan.

2) View and implement a plan:

After you set a training plan in the Zepp app, daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

Source: https://support.amazfit.com/en/faq/10765

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[17.4] a reception component configured to receive an indication, by way of the display, that the user

Company provides a reception component configured to receive an indication, by way of the display, that the user desires for the selected training plan to be a current training plan for the user.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the user sets the customized training plan ("selected training plan) in the Zepp app. Therefore, upon information and belief, the application comprises a reception component configured to receive an indication in the form of setting of the training plan, that the user desires for the customized training plan to be a current training plan for the user.

desires for the selected training plan to be a current training plan of the user; and

1) Start a plan:

Open the Zepp app, go to the home page to find the Zepp Coach card, tap Customize Plan, fill in your workout condition in the past 1 to 2 months as guided, and select rest days and start date to start the plan.

2) View and implement a plan:

After you set a training plan in the Zepp app, daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

Source: https://support.amazfit.com/en/faq/10765

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[17.5] an appointment component configured to appoint the selected training plan as the current training plan for the user in response to the indication that the user

Company provides an appointment component configured to appoint the selected training plan as the current training plan for the user in response to the indication that the user desires for the selected training plan to be the current training plan.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, after the user sets the training plan in the Zepp app ("in response to the indication that the user desires for the selected training plan to be the current training plan"), the workout recommendations are synced to the device where the app is installed. Therefore, it would be apparent for a person having ordinary skills in the art that the application comprises an appointment component configured to appoint the customized training plan as the current training plan for the user.

desires for the selected training plan to be the current training plan,

1) Start a plan:

Open the Zepp app, go to the home page to find the Zepp Coach card, tap Customize Plan, fill in your workout condition in the past 1 to 2 months as guided, and select rest days and start date to start the plan.

2) View and implement a plan:

After you set a training plan in the Zepp app, daily workout recommendations will be synced to your device. You can view the plan in the Zepp Coach app on your watch. Or, you can go to the home page to find the Zepp Coach card and view the plan on the details page.

After you start the plan, please use the device while you are working out. You can quick-start a common workout at Device > Zepp Coach or select a workout at Device > Workouts to select and start a workout. In both cases, the results will be included in the workout statistics of the day. After the workout, please promptly sync the workout records to the Zepp app.

Source: https://support.amazfit.com/en/faq/10765

Once you get started on your plan, Zepp Coach™ will work in tandem with your Amazfit device to learn how your body responds to exercise. As you train, Zepp Coach™ collects and analyzes valuable physiological data during and between your workouts, such as fatigue level, fitness level, and training status. Using this data, it can automatically adjust scheduled workout duration, frequency and intensity - and may even recommend taking a rest day - to maximize efficacy while minimizing the risk of overtraining or injury.

Source: https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[17.6] where the score component, the selection component, the output component, the reception component, the appointment component, or a combination

Company provides a system where the score component, the selection component, the output component, the reception component, the appointment component, or a combination thereof is implemented, at least in part, by way of a combination of hardware and software.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the process of scoring, customizing or personalizing the training plan, displaying the customized training plan, and setting the training plan ("the score component, the selection component, the output component, the reception component, the appointment component, or a combination thereof"), is completed by using a biotracker sensor in the Amazfit wearable ("hardware"), that provides workout records to the Zepp Coach in the Zepp app ("software").

thereof is implemented, at least in part, by way of a combination of hardware and software.

Health-Centered

The Zepp OS works in tandem with the advanced

BioTracker[™] PPG optical sensor and the self-developed algorithms found in Amazfit devices, to provide personal health and fitness data monitoring.



Source: https://www.zepp.com/technology

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progress through their plan, Zepp Coach™ provides scientific guidance to help them manage their training intensity in order to reduce the risk of problems caused by potential overtraining.

Source: https://www.zepp.com/technology

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall
supplement these contentions pursuant to production of such source code by the Company.

2. List of References

- 1. https://www.zepp.com/technology, last accessed on 29 November, 2023.
- 2. https://www.zepp.com/blog/zepp-coach-tm-amazfit-stepping-up-performance, last accessed on 29 November, 2023.
- 3. https://support.amazfit.com/en/faq/10765, last accessed on 29 November, 2023.